

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

INSPIRE MEDICAL BILLING, LLC,

Plaintiff,

-vs-

HMR FUNDING, LLC, and VELOCITY  
MEDICAL RECORDS SOLUTIONS, LLC,

**Case No: 2:20-cv-10658  
Hon. Bernard A. Friedman**

Defendants.

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**AFFIDAVIT UNDER OATH OF MARK GUEDRI**


Mark Guedri, being first duly sworn, deposes and states that he has personal knowledge of the matters asserted below, is competent testify to the contents thereof, and that to the best of his knowledge and belief, the matters set forth herein are true:

1. I am over the age of 18 and am competent to make this Affidavit.
2. I served as CEO for HMR Funding, LLC, from 2012 to 2019 and as CEO of Velocity Medical Records Solutions, LLC, from 2017 to 2019. I submit this Affidavit in support of O'Hagan Meyer's Motion to Withdraw as Counsel.
3. Both HMR Funding, LLC, and Velocity Medical Records Solutions, LLC, are in the process of dissolution and neither entity has funds with which to pay counsel or any other accounts payable.

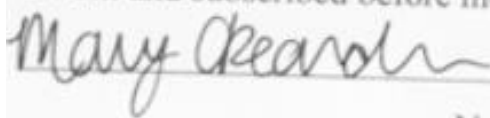
4. I have communicated to counsel Burkholder that the entities cannot pay for previously performed legal services and are no longer operating businesses with any expectation of future earnings.

5. I have been informed by counsel since June of 2020, that O'Hagan Meyer would withdraw from representation of HMR Funding, LLC, and Velocity Medical Records Solutions, LLC, if the entities were unable to pay for legal services rendered.

Dated: October 19, 2020

  
\_\_\_\_\_  
Mark Guedri

Sworn and subscribed before me this 28 Day of October, 2020

  
\_\_\_\_\_, Notary Public

Henrico County, State of Virginia

My commission expires: 10/31/2023

